

EXHIBIT

B

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway
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(973) 228-9898

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

XAVIER INGRAM,

Plaintiff,

vs.

COUNTY OF CAMDEN,
CAMDEN COUNTY POLICE DEPARTMENT,
JEREMY MERCK,
ANTONIO GENNETTA,
NICHOLAS MARCHIAFAVA,
JOHN SCOTT THOMSON,
JOHN DOE(S) 1-50, and ABC ENTITIES 1-10,

Defendants.

CIVIL ACTION NO. 1:14-CV-05519

**CERTIFICATION OF
XAVIER INGRAM IN FURTHER
SUPPORT OF MOTION SETTING
ATTORNEYS FEES**

XAVIER INGRAM, of full age, hereby certifies as follows:

1. I brought this action to recover damages for serious permanent injuries I suffered during the course of an arrest by Camden County Police Department Officers on June 12, 2014. All of the facts contained herein are based upon my own personal knowledge.

2. This Certification is made in further support of the pending fee application of my counsel, Mazie Slater Katz & Freeman, LLC's ("Mazie Slater"), which as I indicated in my prior Certification, I fully support. This Certification is filed in response to the letter filed on August 4, 2022 by William Cook challenging the Power of Attorney I gave to my sister Ashley Ingram and the Retainer Agreement she signed on my behalf with Mazie Slater.

3. On June 13, 2014, the day after I was assaulted by the Camden County Police, I woke from surgery. I was conscious and alert. I was fully capable of understanding what

was being said to me, including being told that I was now paralyzed from the neck down. Although I was on a ventilator, I was able to communicate by blinking my eyes, and indicating "yes" and "no." I was able to understand and answer questions about what happened to me, including that the police officers beat me and broke my neck.

4. On June 13, 2014, I was told that I was being charged with criminally and it was clear to me and my family that I would need an attorney. That day, at the request of my sister, Ashley Ingram, an attorney from Mazie Slater, Adam Epstein came to the hospital. Mr. Epstein explained that he was there on behalf of Beth Baldinger who had spoken with my sister, Ashley. Although Ms. Baldinger could not be at the hospital that day, she would be taking the lead on my case. Mr. Epstein explained that no action could be taken on my behalf until Mazie Slater was retained.

5. As I was on a ventilator and paralyzed, I was advised that I could use a Power of Attorney to appoint a family member to act on my behalf, until hopefully I was able to do so on my own. I was shown the Power of Attorney papers and it was explained to me that the person I selected would be authorized to retain counsel and to act on my behalf in pursuing and protecting my legal interests. I indicated that I wanted my sister Ashley Ingram to have that responsibility. I fully understood what was explained to me. The Power of Attorney form was signed at my bedside by my sister Ashley and Mr. Epstein. This was done with my knowledge and consent. I fully trusted my sister Ashley Ingram to act on my behalf.

6. Mr. Epstein also showed me and explained the Retainer Agreement with Mazie Slater. I understood what was explained to me, including the fee arrangement and gave my consent for my sister Ashley to sign it on my behalf. I understood that Beth

Baldinger and Mazie Slater would then be my attorneys. The Retainer Agreement was also signed bedside in my presence by my sister Ashley Ingram and Mr. Epstein.

7. Also present when the Power of Attorney and Retainer Agreement were signed was Kitty Hailey, a private investigator hired by Mazie Slater. Ms. Hailey took photographs, attached to this Certification, which show my sister, Ashely Ingram, my grandmother, Vanessa Adams and Mr. Epstein at my bedside. (Annexed as Exhibit A to this Certification are the photographs)

8. When the Power of Attorney and Retainer Agreement were reviewed with me, I was not mentally incompetent. I fully understood what was said to me and had these documents signed on my behalf with my knowledge and consent. As is obvious, I was paralyzed and unable to sign any documents myself.

I certify that the above statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



XAVIER INGRAM

Dated: August 4, 2022



Audit Trail

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Sent for signature to Xavier Ingram (zeekisme@icloud.com)
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08 / 04 / 2022
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Signed by Xavier Ingram (zeekisme@icloud.com)
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The document has been completed.

EXHIBIT

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